

## REMARKS

Independent claim 1 was rejected under 35 U.S.C. § 103(a) as being unpatentable over Goodman in view of Franz and Liebenow. Claim 1 has been amended to include subject matter similar to that of claim 2. It is respectfully submitted that none of Goodman, Franz, or Liebenow teach or suggest a controller that moves a cursor to a pre-selected area on a display device in response to the detection of entry into a text entry mode.

In the Office action Goodman and Liebenow were relied on as teaching moving a cursor to a pre-selected area on a device in response to detection of entry into a text entry mode. Office action, pages 3-4. With respect to Goodman, movement of the cursor is in response to actuation of keys that emulate a mouse. *See* column 3, lines 45-56. As such, detecting entry into a text entry mode has nothing to do with cursor movement in Goodman.

Liebenow too fails to disclose that a cursor is moved to a pre-selected area on a display device in response to detection of entry into a text entry mode. For example, a single tap on a touch pad tap is simply *ignored* after the occurrence of a disabling event. [0010]; [0029]. Also, when Liebenow's pointer is a text-select cursor, the cursor is in the text-entry area to *enable* text entry. [0021]. That is, text entry can occur wherever the cursor in Liebenow is positioned in the text-entry area. *Id.* Thus, cursor movement in this case is to *prepare* for text entry.

Liebenow does describe moving the cursor out of the text entry area, to exit the text-entry mode and change the cursor to a pointer. *Id.* But, Liebenow is silent as to what causes the cursor to move out of the text-entry area. Because Liebenow is silent, he fails to disclose moving the cursor out of the text entry area in *response to* entry into a text entry mode. Thus, neither reference, alone or in combination teach all of the limitations of amended claim 1.

Under a similar analysis, independent claims 10, 17, and 26 are also believed to be patentable over the cited references.

In view of the amendments and remarks herein, the application is believed to be in condition for allowance. The examiner's prompt action in accordance therewith is respectfully requested. The commissioner is authorized to charge any additional fees, including extension of time fees, or credit any overpayment to Deposit Account No. 20-1504 (ITL.0567US).

Respectfully submitted,

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